

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 04-11192-NMG

Eric Kelley,
Plaintiff, Pro Se

v.

Sheriff DiPaola, Superintendent Norton,
Officer Thurman Hall, Sgt. Joseph Flynn,
Billerica House of Correction Legal Dept.,
Attorney Lee Gartenberg, Attorney John
Goggin, Commissioner of the Massachusetts
Board of Health, Commissioner of Public
Safety, and Billerica Board of Health,
Defendants.

Plaintiffs
Motion To:
Condemn
the Billerica
H.O.C. Due
to the same
reasons and
conditions of
the Suffolk Jail.

United States District Court,
D. Massachusetts.

INMATES of the SUFFOLK COUNTY JAIL et al., Plaintiffs,

v.

Thomas S. EISENSTADT et al., Defendants.

Civ. A. No. 71-162-G.
June 20, 1973.

Now comes the plaintiff and
requests Total Condemnation and
destruction of the Billerica H.O.C.
because (24 years) later ^{After} ~~than~~ the
Suffolk ruling the same atrocious
conditions are prevelant (we go back in
time to degradation)

Motion developed
on 3/05
prior to
state placement

Respectfully
Eric Kelley